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Attorneys for Plaintiff
Neighborhood Assistance Corporation of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NEIGHBORHOOD ASSISTANCE
CORPORATION OF AMERICA, a Massachusetts
corporation,

Plaintiff,

v.

NATIONAL MEDIA CONNECTION, LLC, a
Connecticut limited liability company, THE
NATIONAL MORTGAGE HELP CENTER,
LLC, a Connecticut limited liability company, and
MATTHEW S. GOLDREICH, an individual,

Defendants.

Case No. CV-13-1698-CRB

**STIPULATION TO CONTINUE
RESPONSE DEADLINE AND CASE
MANAGEMENT CONFERENCE AND
ORDER**

Hon. Charles R. Breyer

Complaint filed: April 15, 2013

Plaintiff Neighborhood Assistance Corporation of America (“Plaintiff”) and Defendants
National Media Connection LLC, The National Mortgage Help Center LLC and Matthew S.
Goldreich (“Defendants”) hereby stipulate and agree as follows:

STIPULATION

WHEREAS Plaintiff filed its Complaint against Defendants on April 15, 2013;

WHEREAS the parties previously stipulated and agreed that each Defendant was served
with the Summons and Complaint and that such service was deemed to have occurred on May 1,

2013;

WHEREAS the parties previously agreed that Defendants' response to the Complaint would be due on August 15, 2013; and

WHEREAS the parties are now engaged in settlement discussions which may result in a complete resolution of this entire litigation, and now wish to avoid the time and expense of litigating this action while such settlement discussions are ongoing;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto and their respective undersigned attorneys, as follows:

1. The last day for Defendants to file a responsive pleading to the Complaint is extended to September 6, 2013;
2. By entering into this Stipulation Defendants do not waive any challenges they may wish to make to the jurisdiction and/or venue of this Court, should this matter not settle; and
3. The Case Management Conference presently scheduled for August 30, 2013 at 8:30 a.m. will be continued until October 11, 2013 at 8:30 a.m., and all deadlines tied to the Case Management Conference date shall be keyed to the new date.

DATED: August 23, 2013

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

By: /S/ Christopher J. McNamara
Christopher J. McNamara

Attorneys for Plaintiff
Neighborhood Assistance Corporation of America

DATED: August 23, 2013

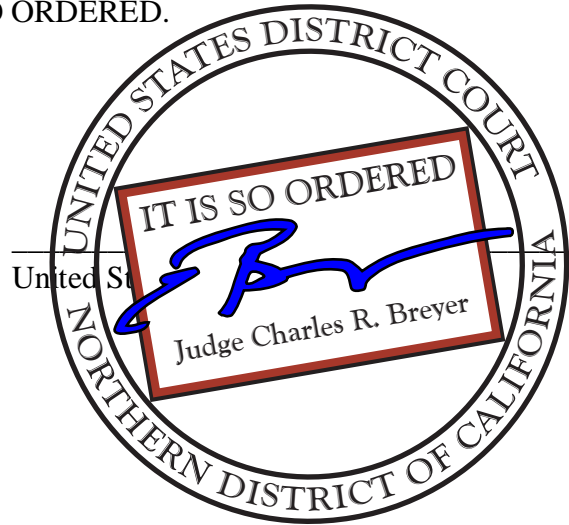
FOX ROTHSCHILD LLP

By: /S/ James E. Doroshow
James E. Doroshow

Attorneys for Defendants
National Media Connection, LLC, National Mortgage Help
Center, LLC and Matthew S. Goldreich

PURSUANT TO STIPULATION, IT IS SO ORDERED.

August 27, 2013



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